

COPY

COMPETITIVE COMMUNICATIONS GROUP

June 11, 1999

REC'D TN
REGULATORY AUTH.

'99 JUN 11 AM 9 51

OFFICE OF THE
EXECUTIVE SECRETARY

David Wadell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37219

RE: Amended IntraLATA Toll Dialing Parity Plan

99-00362

The accompanying amended IntraLATA Dialing Parity Plan, issued by Community Telephone Corporation (Company) is sent to you for filing in compliance with the review of Mr. Carsie Mundy with TRA.

An original and thirteen copies are enclosed. Additionally, a SASE and a return stamp copy of this transmittal letter are enclosed to confirm receipt of this filing. Questions concerning this filing may be directed to the undersigned on 301/ 842-1437.

Respectfully submitted,

Terri K. Firestein

Terri K. Firestein
Consultant
on behalf of

Community Telephone Corporation

Enclosures

cc: John Greenbank
Community Telephone Corporation

COPY

Application of Community Telephone Corporation for Approval of
IntraLATA Toll Dialing Parity Plan Pursuant to FCC Order
FCC 99-54, CC Docket No. 96-98, Released March 23, 1999

Community Telephone Corporation

May 17, 1999

AMENDED June 11, 1999

Community Telephone Corporation IntraLATA Toll Dialing Parity Plan

I. OBJECTIVE/PURPOSE

In Compliance with the Federal Communications Commission ("FCC") rules delineated in 47 C.F.R. Sections 51.207 through 51.215, Community Telephone Corporation ("the Company") files its plan for implementing intraLATA toll dialing parity ("the Plan") in areas of the State in which the Company is certified to provide local exchange service.

The intent of the Plan is to permit customers to select and subsequently to route intraLATA toll calls automatically without the use of access codes, to the interexchange carriers ("IXC") that have established themselves as Access Customers of the Company ("Participating Carrier").

This Plan will be effective in all exchanges the Company will provide local exchange service in. These exchanges will be located in the 468, 470, 472, 474 and 956 Tennessee LATAs.

II. IMPLEMENTATION SCHEDULE

The Company intends to offer dialing parity for intraLATA calls within thirty (30) days of state commission approval of the Plan.

III. CARRIER SELECTION PROCEDURES

The Company will implement the full 2-PIC carrier selection methodology. With the full 2-PIC methodology, customers will be able to subscribe to one Participating Carrier for their interLATA toll calls and to subscribe to the same or a different Participating Carrier for their intraLATA toll calls.

Company employee's who communicate with the public, accept service orders and serve in customer service capacities will be trained to explain the availability of 2-PIC Equal Access, and to assist customers in making an initial PIC selection or in changing a PIC selection.

IV. CARRIER NOTIFICATION

An IXC that desires to become an Access Customer and Participating Carrier shall notify the Company by requesting and completing the Carrier Participation Form. The request for this Form may be made by telephone or e-mail to the designated Company carrier relations contact. Once the Carrier Participation Form has been returned to the Company and an Access Service Request has been processed, that carrier will be added to the alphabetical list of Participating Carriers maintained in each business office.

V. CUSTOMER EDUCATION and NOTIFICATION

Customers will receive information explaining their opportunity to select an intraLATA toll service provider a minimum of thirty (30) days in advance of the offering of intraLATA toll dialing parity via a bill message or insert. The Company anticipates that promotional strategies by intraLATA toll service providers will contribute to Customer awareness of intraLATA toll dialing parity. Customer Telephone Directories will be updated as new editions are published to reflect the opportunity for Customers to select an intraLATA toll service provider.

Community Telephone Corporation IntraLATA Toll Dialing Parity Plan

VI. CUSTOMER SELECTION PROCESS

Customers contacting the Company requesting local exchange service will be informed of the opportunity to select both an intraLATA and interLATA PIC at no charge. If requested by the customer, the Company will provide an alphabetical list of Participating Carriers. Customers who do not make an affirmative selection of an intraLATA toll service provider will be identified in the Company records as a "no-PIC" and will not be defaulted to a toll service provider. New customers identified in the Company records as "no-PIC" will be required to dial the access code 101XXXX where XXXX represents the identification code of the carrier they desire to use. The use of the access code will be required for placement of each intraLATA toll call until they make an affirmative selection.

VII. INITIAL PIC REQUEST

A customer's initial PIC request will be made at no charge for the first six (6) months after intraLATA subscription service becomes available. After the initial six (6) months, the Company will charge customers the intraLATA PIC Change Charge at tariffed rates. An initial application of "no-PIC" will, for purposes of applying the PIC Change Charge, be viewed as an affirmative PIC selection.

VIII. PIC CHANGE REQUEST FROM A CUSTOMER

A customer's request to change his/her current intraLATA PIC will be accepted and processed by the Company in accordance with current FCC PIC change procedures. The customer will incur a non-recurring PIC Change Charge of \$ 5.00. This charge will be tariffed prior to implementation.

IX. PIC CHANGE REQUEST FROM A PARTICIPATING CARRIER

A customer's request to change his/her current intraLATA PIC received by the Company from a Participating Carrier on behalf of said customer will be accepted and processed by the Company in accordance with current FCC PIC change procedures. The customer will incur a non-recurring PIC Change Charge of \$ 5.00. This charge will be tariffed prior to implementation.

X. ACCESS to OPERATOR SERVICES and DIRECTORY ASSISTANCE

Access to Operator Services and Directory Assistance will continue to be available through the Customer's local exchange service provider or interLATA toll service provider. No industry standard has been established for access to Operator Services and Directory Assistance unique to the intraLATA toll service provider. For Operator Services, Customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, Customers dial "1-411" in the Company's service territory for accessing the local exchange Directory Assistance and Customers dial "1-NPA-555-1212" for accessing their interLATA toll service provider's Directory Assistance.

The local and interLATA Operator Services and Directory Assistance may be branded by the local and interLATA service providers, as appropriate, based on the dialing pattern of the Customer. Since no unique intraLATA dialing pattern currently exist in the industry, the Company is not capable of identifying intraLATA calls to the Company's or the interLATA toll service providers operators or directory assistance representatives. As such, this procedure is considered in compliance with FCC Order No. 96-333, Rule 51-217(d).

Community Telephone Corporation IntraLATA Toll Dialing Parity Plan

XI. ANTI-SLAMMING PROCEDURES

The Company will enforce the FCC slamming rules currently in place from the December 23, 1998 Second Report and Order, CC Docket No. 94-129 pertaining to PIC Verifications and Preferred Carrier Freezes. The Company anticipates enforcing the FCC slamming liability rules recently stayed by the U.S. Court of Appeals for the District of Columbia upon FCC and Court action and approval.

XII. COST RECOVERY

As stated in section 51.215 of FCC Order 96-333, CC Docket No. 96-98, "a LEC may recover the incremental costs necessary for the implementation of toll dialing parity. The LEC must recover such costs from all providers of telephone exchange service and telephone toll service in the area served by the LEC, including that LEC." The incremental costs associated with implementing toll dialing parity by the Company include:

1. training for Business Office, Marketing, Carrier Services, Customer Services and Service Center personnel
2. customer notification (bill message and bill insert)
3. implementation activity

The Company proposes to recoup the incremental cost of implementing intraLATA dialing parity over a period of twelve months beginning on the date of implementation or beginning on the date the Company begins providing local exchange service in the State, which ever is first. A cost recovery per minute rate will be developed based on the identified cost divided by the total of all participating carrier's originating minutes of use, which will include the Company's intraLATA toll minutes. The result will be an amount to be added (adder) to the intraLATA Carrier Common Line (CCL) rate element.

Carrier's who enter the market after implementation will be assessed the adder in the same manner as other Participating Carriers. The adder will be calculated at the time the Company begins providing local exchange service in the State.

XIII. CONCLUSION

The Company will comply with all applicable rules of the FCC and of TRA.